

SCANNED

UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

AMEND

COMPLAINT

**Keshenia Margaret Pawaroo**

133-36 Lefferts Boulevard

South Ozone Park, New York 11420

Plaintiff,

**V.**

CIVIL CASE NO:

**15-CV-4215-(LAP)**

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC#  
DATE FILED: 4/26/16

**Yves Lango**

435 EAST 57<sup>TH</sup> Street, Suite# 1B

New York, New York 10022;

**Dominika Lango,**

435 East 57<sup>th</sup> Street, Suite# 1B

New York, New York 10022;

**Silvester Lango, MD**

435 East 57<sup>th</sup> Street, Suite 1B

New York, New York 10022

Defendant(s).

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## COMPLAINT

Plaintiff Keshenia Margaret Pawaroo against known defendants, Yves Lango, Dominika Lango and Silvester Lango, MD, allege as follows:

## JURISDICTION AND VENUE

1. This court has jurisdiction over this action under 28 U.S.C 1331 and 1343(a)(3), 1343(a)(4), 28 U.S.C. 1367 and 42 U.S.C. 1983. The matter in controversy arises under the Fifth and Eight Amendment of the United States Constitution.
2. Venue properly lies in this District pursuant to 28 U.S.C. 1391(b)(2). The omissions giving rise to the cause of action occurred at Dr. Silvester Lango Office, located in New York, New York, which is situated within the Southern District of New York.

## PARTIES

3. Plaintiff Keshenia Margaret Pawaroo ("hereinafter" "Pawaroo") is and was at all times relevant hereto, an employee at Doctor Silvester Lango Office.
  4. Defendant Yves Lango ("hereinafter" "Yves") was at all times relevant hereto, the son of Doctor Silvester Lango and Dominika Lango.
  5. Defendant Dominika Lango ("hereinafter" "Dominika") was at all times relevant hereto the wife of Doctor Lango and mother of Yves Lango.
  6. Defendant Silvester Lango ("hereinafter" "Silvester") was at all times relevant hereto the father of Yves Lango.
- 2

## FACTS

7. On or about September 19, 2001, Plaintiff Pawaroo was employed by Dominika Lango to work as a Medical Assistant for her husband Silvester Lango, MD, Office. Plaintiff Pawaroo Hours were 9:00AM to 5:00PM.
8. Plaintiff Pawaroo started working and was told by Dominika not to be on the phone with the patients more than one minute. Plaintiff Pawaroo was told to answer the Phone "Dr. Lango Office". Plaintiff Pawaroo was told if patients call for refill of medications they have to visit the doctor even if they were in the office a week ago.
9. From the first day Plaintiff Pawaroo start working, Plaintiff Pawaroo was told by Dominika not to be on the phone with a patient more than a minute. "Plaintiff Pawaroo should answer the phone, "Doctor Lango's office, no goodmorning nor goodafternoon, nor how you are feeling, nor any conversations. Just to the point, what they are calling for. Dominika told Plaintiff Pawaroo if any patient calling for medications they have to come in the office to see the doctor even if they were in the office a week ago.
10. Eventually Yves Lango, who is mentally ill, started to come to the office. Plaintiff was then told to train him about insurance and patients charts. Yves Lango worked their for a year then his Father Dr. Silvester Lango trained him to take x-ray on patients. Yves usually be in the x-ray room alone with the patients. Patients will ran out of the room upset because of Yves behavior. Plaintiff Pawaroo was told by Dr. Lango, if any patient

ask about Yves, tell them he is a student, and not his son, whereas, Yves is Dr. Lango son and he was mentally ill.

11. As time went by Yves started sleeping in the office for weeks, who is a mentally ill person and stop taking his medications. Yves did strange things in the office for example empty the office cabinets and place everything on the floor, walking around the office brushing his teeth. Yves slept in the office. When Plaintiff Pawaroo arrived to work in the morning, and If Yves there, he will curse her out and sometimes kicked her in her chest when Dr. Lango, or Dominika not present. Yves was so mentally ill he will urinate all over the office.
12. Dominika and Dr. Lango always say it's was a vacation for Yves at the office from home. Plaintiff safety was not there concern which both Dominika and Dr. Lango knows it was a HIPPA violation. (Training Service in Healthcare Industries).
13. On September 08, 2009, Plaintiff entered Dr. Lango Office. Yves was in the restroom, so Plaintiff went to her locker to get ready for work. Yves broke Plaintiff Pawaroo locker and put everything was on the floor. Plaintiff then decided to change her clothes to start working. When Plaintiff Pawaroo turn around and lift her head she saw two feet infront of her. 'PLAINTIFF LOOK UP AND IT WAS YVES NAKED, PLAINTIFF WAS IN A SHOCK, AND STARTED SCREAMING, BUT HER VOICE COULDN'T COMES OUT AND THERE WERE NO ONE PRESENT IN THE OFFICE THE SAID TIME. YVES STOOD INFRONT OF PLAINTIFF, BRACED PLAINTIFF IN THE CORNOR, HE WAS QUIET AND LOOK LIKE A DEMON POSSESSED PERSON. YVES PULLED PLAINTIFF PANTS WITH HER UNDERWEAR DOWN, HE THEN TOOK HIS BODY AND PRESSED HIS PRIVATE PARTS AGAINST PLAINTIFF. PLAINTIFF

THEN PUSHED HIM TOWARDS THE X-RAY TABLE, HE HIT HIS BACK AND PLAINTIFF THEN RAN TOWARDS THE BATHROOM AND LOCKED HERSELF INSIDE. Plaintiff Pawaroo couldn't believe this was happening and was in a shock. After a while Plaintiff Pawaroo, heard a door slam, Plaintiff Pawaroo then open the bathroom door and the office was silent. Plaintiff Pawaroo then ran to the x-ray room, put on her pants she came to work with, and could not stop crying. Plaintiff Pawaroo then went to her desk to do her work. Eventually, the office door open and a gentleman came in and said, "THE CRAZY GUY (YVES), RAN OUT OF THE OFFICE AND DIDN'T SAY ANYTHING. THE GENTLEMAN MAN THEN ASKED PLAINTIFF PAWAROO IF SHE IS OK WHEN SAW HER CRYING AND SHE SAID YES," THANK YOU FOR COMING IN THE OFFICE AND SAVE ME FROM GETTING RAPED BY YVES.

Plaintiff left the office at 05:00Pm and went home crying. The next day Dominika was in the office in the presence of Yves and asked Plaintiff Pawaroo if she is ok. Plaintiff then explained to Dominika what happened the day before, but Dominika takes no action.

14. Around August 2010, on a Tuesday, Plaintiff Pawaroo went to the Office about 9:30AM.

Yves was in the office because he lives there. Yves went to the bathroom then left the office after. As the day went by, Yves came in around 03:30PM, Yves went to the restroom, while Plaintiff Pawaroo was trying to finish her job to leave early. YVES CAME OUT OF THE BATHROOM NAKED AGAIN AND WAS STANDING INFROM OF PLAINTIFF. PLAINTIFF PAWAROO SAID TO YVES, "WHAT ARE YOU DOING?"), YVES GRAB PLAINTIFF PAWAROO SHIRT AND PULLED HER TOWARDS HIM AND SAID, "KESHENIA YOU DON'T HAVE A HUSBAND AND I DON'T HAVE A GIRLFRIEND, JUST SUCK MY DICK. PLAINTIFF

5

PUSHED YVES AWAY AND WENT IN THE X-RAY ROOM AND LOCKED THE DOOR.

PLAINTIFF ANGER AND FRUSTRATION THEN CAME INTO PLAY AND SHE STARTED

CRYING. PLAINTIFF PAWAROO THEN TOOK HER BAG AND WALK OUT.

15. As the time goes by, Plaintiff got so depressed, went home screaming and breaking things in her home, and crying loud. Plaintiff depression continued and behavior changed. As time went by at the office Yves kept on doing the same thing, whereas, Dr. Lango and Dominika was aware of and would not do anything about it.

16. On September 6, 2011, Plaintiff went to work and on her way in the building, the Doorman told Plaintiff Pawaroo that Yves the crazy guy is in the office, just be careful. Plaintiff went to the office and didn't see him. Plaintiff then went to use the bathroom and upon opening the door, YVES WAS NAKED IN THE BATHROOM, Plaintiff ran out of the office and Yves decided to dress and leave. YVES CAME BACK AROUND 2:30PM, Yves went into the bathroom and came out around 03:30PM, YVES RAN TOWARDS PLAINTIFF PAWAROO AND GRAB HER SHIRT, YVES WAS NAKED AGAIN AND SAID TO PLAINTIFF PAWAROO, "SUCK MY DICK." PLAINTIFF PAWAROO PUSHED HIM AWAY AND RAN AGAIN. Plaintiff Pawaroo then called Dominika and told her what Yves is doing again, then Plaintiff left the office. Dominika told Plaintiff that she is coming to pick him up. Plaintiff Pawaroo then cried all the way home.

17. In October 2011, Plaintiff then spoke to Dr. Lango and told him what was going on in the office, Dr. Lango apologized to Plaintiff Pawaroo, and said that he will speak to Dominika.

18. Dominika then came in the office the next day and said that Yves is joking, he did not see his Psychiatrist for a long time and just looking for a girlfriend, "Laughing."

19. Plaintiff was depressed, couldn't deal with the sexual harassment and torture from Yves anymore. Plaintiff Pawaroo went to her medical doctor and told him she needs to see a therapist, the doctor then gave her a referral. Plaintiff Pawaroo made several attempts to commit suicide, and was admitted into Jamaica Hospital Psychiatrist Ward where she spent two week. Plaintiff Pawaroo continues to undergo treatment and take medications. Plaintiff life is never the same, Plaintiff also gets nightmare, and didn't returned to work for Dr. Lango's Office. (SEE EXHIBIT ((A))

#### **COUNT ONE:**

**SEXUAL HARRASMENT AND TORTURE BY YVES LANGO VIOLATES PLAINTIFF FIFTH AND EIGHT AMENDMENT RIGHTS OF THE UNITED STATES CONSTITUTION.**

23. Pawaroo realleges and incorporate by reference her allegations in paragraph 1 through 19 as if fully stated herein.

24. On several occasions defendant Yves Lango sexually harassed and torture Plaintiff Pawaroo. Plaintiff Pawaroo now suffered from mental illness and diagnosed as a post traumatic stress disorder, and continue to

receive monthly medication management with Doctor Sultana, and weekly individual psychotherapy with Ms. Josue.

WHEREFORE, the Plaintiff Pawaroo prays that this Honorable Court will enter a judgment in favor of the Plaintiff and against the Defendant(s) and award the following relief:

- (a) A Court order declaring that the Defendant(s) have acted in violation of the United States Constitution;
- (b) Compensatory damages for the Amount of \$5,000,000.00
- (c) Punitive damages of \$5,000,000.00
- (d) Attorney's fees and costs; and
- (e) Such additional relief as this Honorable Court may deem just and proper.

**COUNT TWO:**

DR. SILVESTER LANGO, THE FATHER OF YVES LANGO WAS AWARE OF THE SEXUAL HARASSMENT AND TORTURE BY YVES LANGO WHO WAS MENTALLY ILL AND DID NOTHING TO PROTECT PLAINTIFF'S PAWAROO RIGHTS, IN VIOLATION OF THE FIFTH AND EIGHT AMENDMENT RIGHTS OF THE UNITED STATES CONSTITUTION.



25. Pawaroo realleges and incorporate by reference her allegations in Paragraph 1 through 19 as if fully stated herein.

26. On several occasions defendant Silvester Lango, MD, was aware of the sexual harassment and torture by his son Yves to Plaintiff Pawaroo, and did nothing to prevent it, whereas, he was fully aware that his son Yves was mentally ill. Plaintiff Pawaroo now suffered from mental illness and diagnosed as a post traumatic stress disorder, and continue to receive monthly medication management with Doctor Sultana, and weekly individual psychotherapy with Dr. Josue.

WHEREFORE, THE Plaintiff Pawaroo prays that this Honorable Court will enter judgment in favor of the Plaintiff and against Defendant(s) and award the following relief:

- (a) A court order declaring Defendant(s) have acted in violation of the United States Constitution;
- (b) Compensatory damages for the amount of \$5,000,000.00
- (c) Punitive damages of \$5,000,000.00
- (d) Attorney's fee and costs; and

(e) Such additional relief as this Honorable Court may deem just and proper.

### COUNT THREE

DOMINIKA LANGO THE MOTHER OF YVES WAS AWARE OF THE SEXUAL HARRASMENT AND TORTURE BY YVES LANGO TO PLAINTIFF PAWAROO AND DID NOT DO ANYTHING TO STOP IT, IN VIOLATION OF PLAINTIFF'S PAWAROO FIFTH AND EIGHT AMENDMENT RIGHTS OF THE UNITED STATES CONSITUTION.

27. Pawaroo realleges and incorporate by reference her allegations in paragraph 1 through 19 as if fully stated herein.

28. On several occasions defendant Dominika was aware of the sexual harassment and torture to plaintiff Pawaroo by Yves and did nothing to prevent it.

29. Plaintiff Pawaroo now suffered from mental illness and diagnosed as a post traumatic stress disorder, and continue to receive monthly medication management with Doctor Sultana, and weekly individual psychotherapy with Dr. Josue.

WHEREFORE, the Plaintiff Pawaroo prays that this Honorable Court will enter a judgment in favor of the Plaintiff and against the Defendant(s) and award the following relief:

- (a) A court order declaring that the Defendant(s) have acted in violation of the United States constitution;
- (b) Compensatory damages for the amount of \$5,000,000.00
- (c) Punitive damages of \$5,000,000.00
- (d) Attorney's Fee and costs; and
- (e) Such additional relief as this Honorable Court may deem just and proper.

Dated: 4 / 11 / 16

Respectfully Submitted,

Keshenia M. Pawaroo

Keshenia Margaret Pawaroo  
133-36 Lefferts Boulevard  
South Ozone Park, New York 11420

//

## CERTIFICATE OF SERVICE

I, Plaintiff Keshenia Margaret Pawaroo duly sworn that I sent a Copy of Plaintiff's Complaint via United States First Class Mail to the following:

Yves Lango

435 East 57<sup>th</sup> Street, Suite# 1B

New York, New York 10022;

Silvester Lango, MD.

435 East 57<sup>th</sup> Street, Suite# 1B

New York, New York 10022;

Dominika Lango

435 East 57<sup>th</sup> Street, Suite# 1B

New York, New York 10022

Dated: 04 / 11 / 2016

Respectfull Submitted,



Keshenia Margaret Pawaroo

133-36 Lefferts Boulevard,

South Ozone Park, NY 11420

# **EXHIBIT**

## **(A)**

**JHMC Medical 3 Outpatient Clinic**

9009 Van Wyck Expressway

2nd Floor

Jamaica NY 11418

Phone: 718-206-7795

Fax: 718-206-7083

December 15, 2015

To Whom It May Concern:

Ref: Keshenia Pawaroo

Ms. Keshenia Pawaroo is a 50 y/o female under our care since 2012 for her mental illness , diagnosed as a post traumatic stress disorder after she was sexually harassed by son of her employer in September 2009. Ms. Pawaroo was admitted in the psych. 2 unit from 5/20/2012 for 10 days.

Currently she is receiving monthly medication management with Dr. Sultana, and weekly individual psychotherapy with Ms. Josue.

Should you have any questions please call me at 718 206-7795 .

Thank you.

MARLENE JOSUE, L.C.S.W.  
Psychotherapist



Ms. M. Josue. Psychotherapist

Keshenia Margaret Pawaroo  
133-36 Lefferts Boulevard  
South Ozone Park, New York 11420

Office of the Clerk  
United States District Court  
FOR THE SOUTHERN DISTRICT OF NEW YORK  
500 Pearl Street  
New York, New York 10007

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Ref: Civil Case No: 15-CV-4215-(LAP)

Dear Clerk,

On March 30, 2016, The Honorable Chief Judge Loretta A. Preska, requested an amended complaint for sexual Harassment charges against the Lango's family.

Please find attached copy of amended complaint.

Thank you.

Regards,



Keshenia Margaret Pawaroo  
133-36 Lefferts Boulevard  
South Ozone Park, New York 11420

CC: Yves Lango  
Silvester lango  
Dominika Lango

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*UPHILL  
KID*

KESHENIA  
133-36 LEFFERTS  
5000 NE PK NY 11420

USMP3  
SDNY

OFFICE OF THE CLERK  
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Southern District of New York  
500 Pearl St



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